

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE

☐ Eastern (Jackson) DIVISION

☒ Western (Memphis) DIVISION

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THOMAS M. COLEMAN  
CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TN MEMPHIS

Plaintiff, *Patricia Williams*

vs.

No. \_\_\_\_\_

Defendant, *Fedex Freight et al*

COMPLAINT

1. This action is brought for discrimination in employment pursuant to (*check only those that apply*):

☐

Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (amended in 1972, 1978 and by the Civil Rights Act of 1991, Pub. L. No. 102-166) (race, color, gender, religion, national origin).

*NOTE: In order to bring a suit in federal district court under Title VII, you must first obtain a right to sue letter from the Equal Employment Opportunity Commission.*

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Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 – 634 (amended in 1984, 1990, and by the Age Discrimination in Employment Amendments of 1986, Pub. L. No. 92-592, the Civil Rights Act of 1991, Pub. L. No. 102 -166)

*NOTE: In order to bring a suit in federal district court under the Age Discrimination in Employment Act, you must first file charges with the Equal Employment Opportunity Commission.*

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Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 – 12117 (amended by the ADA Amendments Acts of 2008, Pub. L. No. 110-325 and the Civil Rights Act of 1991, Pub. L. No. 1102-166).

*NOTE: In order to bring a suit in federal district court under the Americans with Disabilities Act, you must first obtain a right to sue letter from the Equal Employment Opportunity Commission.*



**JURISDICTION**

2. Jurisdiction is specifically conferred upon this United States District Court by the aforementioned statutes, as well as 28 U.S.C. §§ 1331, 1343. Jurisdiction may also be appropriate under 42 U.S.C. §§ 1981, 1983 and 1985(3), as amended by the Civil Rights Act of 1991, Pub. L. No. 102-166, and any related claims under Tennessee law.

**PARTIES**

3. Plaintiff resides at:

3600 Kipling Ave

STREET ADDRESS

Shelby, Tennessee, 38128, 901494-4805  
County State Zip Code Telephone Number

4. Defendant(s) resides at, or its business is located at:

461 Winchester

STREET ADDRESS

Shelby, Memphis, Tennessee, 38109  
County City State Zip Code

NOTE: If more than one defendant, you must list the names, address of each additional defendant.

<u>Laraye Cole</u>	<u>461 Winchester</u>	<u>Memphis, TN</u>	<u>38109</u>
<u>Monique Holley</u>	<u>461 Winchester</u>	<u>Memphis, TN</u>	<u>38109</u>
<u>Ralph Pippen</u>	<u>461 Winchester</u>	<u>Memphis, TN</u>	<u>38109</u>
<u>Duwan</u>	<u>461 Winchester</u>	<u>Memphis, TN</u>	<u>38109</u>
<u>Tim Roberts</u>	<u>461 Winchester</u>	<u>Memphis, TN</u>	<u>38109</u>

5. The address at which I sought employment or was employed by the defendant(s) is:

461 Winchester Memphis, TN 38109



STREET ADDRESS

Shelby, Memphis, Tennessee, 38109.  
County City State Zip Code

6. The discriminatory conduct of which I complain in this action includes (*check only those that apply*)

- ☐ Failure to hire
- ☒ Termination of my employment
- ☐ Failure to promote
- ☒ Failure to accommodate my disability
- ☐ Unequal terms and conditions of my employment
- ☐ Retaliation
- ☒ Other acts(*specify*): harassment, Hostile environment

**NOTE:** Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court.

7. It is my best recollection that the alleged discriminatory acts occurred on:

Sept 2021, June 2021, May 2021.  
Date(s)

8. I believe that the defendant(s) (*check one*):

- ☒ is still committing these acts against me.
- ☐ is not still committing these acts against me.

9. Defendant(s) discriminated against me based on my:

(*check only those that apply and state the basis for the discrimination. For example, if religious discrimination is alleged, state your religion. If racial discrimination is alleged, state your race, etc.*)



☐ Race \_\_\_\_\_

☐ Color \_\_\_\_\_

☐ Gender/Sex \_\_\_\_\_

☒ Religion \_\_\_\_\_

☐ National Origin \_\_\_\_\_

☐ Disability \_\_\_\_\_

☐ Age. If age is checked, answer the following:  
I was born in \_\_\_\_\_. At the time(s) defendant(s) discriminated against me.

I was [ ] more [ ] less than 40 years old. (check one)

**NOTE:** Only those grounds raised in the charge filed the Equal Employment Opportunity Commission can be considered by the federal district court.

10. The facts of my case are as follows:

On February 22, 2021 I was hired with Fedex Freight as a part-time Service Center Support Staff. In May 2021, I informed Monique Holley (supervisor) I needed a religious accommodation not to work on Sunday. In June 2021 I submitted a reasonable accommodation (No prolonged standing lifting or walking for my medical condition, it was denied. On September 2021 Monique Holley sent me home early for asking her if she could hear music being played. On September 28, 2021 Ralph Appen called and informed me I was discharged for insubordination  
(Attach additional sheets as necessary)

**NOTE:** As additional support for your claim, you may attach to this complaint a copy of the



*charge filed with the Equal Employment Opportunity Commission or the Tennessee Human Rights Commission.*

11. It is my best recollection that I filed a charge with the Tennessee Human Rights Commission regarding defendant's alleged discriminatory conduct on: \_\_\_\_\_
12. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission regarding defendant's alleged discriminatory conduct on: 2/22.  
Date

**Only litigants alleging age discrimination must answer Question #13.**

13. Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding defendant's alleged discriminatory conduct. (*check one*):

- ☐ 60 days or more have elapsed
- ☐ Less than 60 days have elapsed.

14. The Equal Employment Opportunity Commission (*check one*):

- ☐ has not issued a Right to Sue Letter.
- ☒ has issued a Right to Sue letter, which I received on 3/7/22.  
Date

**NOTE:** *This is the date you received the Right to Sue letter, not the date the Equal Employment Opportunity Commission issued the Right to Sue letter.*

15. Attach a copy of the Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.

**NOTE:** *You must attach a copy of the right to sue letter from the Equal Employment Opportunity Commission.*

16. I would like to have my case tried by a jury:

- ☒ Yes
- ☐ No



WHEREFORE, plaintiff prays that the Court grant the following relief:

- ☒ direct that the Defendant employ Plaintiff, or
- ☒ direct that Defendant re-employ Plaintiff, or
- ☐ direct that Defendant promote Plaintiff, or
- ☒ order other equitable or injunctive relief as follows: restrict, Relieve, Restrain  
from any defamation or slander, retaliation
- ☒ direct that Defendant pay Plaintiff back pay in the amount of \$500,000.00  
and interest on back pay;
- ☒ direct that Defendant pay Plaintiff compensatory damages: Specify the  
amount and basis for compensatory damages: suffered harm  
that was financial downfall and humiliation, <sup>emotional</sup> distress

Patricia Williams  
SIGNATURE OF PLAINTIFF

Date: May 19, 2022

3600 Kipling Ave  
Address

Memphis, TN 38128

901 494 4865  
Phone Number